

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068-JTD

Jointly Administered

Re: D.I. 1137

**DECLARATION IN SUPPORT OF THE AD HOC COMMITTEE OF NON-US
CUSTOMERS OF FTX.COM'S MOTION TO FILE UNDER SEAL THE VERIFIED
STATEMENT OF EVERSHEDS SUTHERLAND (US) LLP AND MORRIS, NICHOLS,
ARSHT & TUNNELL LLP PURSUANT TO BANKRUPTCY RULE 2019**

I, [REDACTED], declare under penalty of perjury:

1. I am an individual member of the Ad Hoc Committee of Non-US Customers of FTX.com the (the “Ad Hoc Committee”). I submit this Declaration in support of the *Ad Hoc Committee’s Motion to File Under Seal the Verified Statement of Eversheds Sutherland (US) LLP and Morris, Nichols, Arshzt & Tunnell LLP Pursuant to Bankruptcy Rule 2019* (the “Motion”).

2. I became a customer of FTX Trading LTD. (“FTX”) on or around October 20, 2022. As of the date of the bankruptcy filing, I possessed digital assets and fiat currencies that are currently frozen on the FTX.com platform.

3. In addition to being a customer of FTX, I hold and/or own digital assets that are not involved with FTX or its related entities.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases (collectively, the “Debtors”), a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. In determining whether to place digital assets in an FTX account, I relied upon FTX's Privacy Policy, which allows me to participate anonymously and obligates FTX to protect and keep confidential my personally identifiable information. The decision to become involved with FTX was due, in no small part, to its Privacy Policy.

5. Cryptocurrency is intangible, largely anonymous, and, as a result, incredibly susceptible to attempts at theft. Cryptocurrency that is transferred away from its lawful owner is generally unrecoverable because tracing the transferred tokens, while not impossible, can only be done with much difficulty and expense.

6. Due to the nature of cryptocurrency, and the fact that sophisticated criminals have targeted holders of digital assets, it is crucial to maintain the confidentiality and privacy of the holder and his or her personally identifiable information. Public disclosure of a holder's personally identifiable information creates risks of unlawful injury to the holder. It makes it substantially easier for sophisticated criminals (of which there are many) to target cryptocurrency holders if they possess those holders' personally identifiable information. As an initial matter, if the identities and holdings of cryptocurrency holders are disclosed, it puts criminals on notice as to who holds larger amounts of cryptocurrency and makes those holders a target of criminal enterprises.

7. The disclosure of personal identifiable information also makes the performance of commonplace schemes easier to perform. It is commonly known that criminals' attempts to unlawfully obtain the cryptocurrency are made easier once personally identifiable information is disclosed. Criminals use this information to obtain cryptocurrency unlawfully, using a variety of methods, including hacking online wallets and gaining access to offline wallets and private keys via phishing, spamming, account spoofing, SIM swapping, etc. It has also led to cryptocurrency

holders being the subject of physical violence by criminals attempting to acquire the holder's private keys. All of these things are made easier (if not caused by) the disclosure of the holder's personally identifiable information.

8. The disclosure of my personally identifiable information will also likely negatively affect me professionally and socially.

9. I have spent the majority of my primary career in academia. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Given these things, my status in my community (both professional and social) is one of relatively high visibility.

10. Disclosing my personally identifiable information will likely be detrimental to my professional career because it will reveal a claim that far exceeds the amounts expected to be held by someone in my profession. [REDACTED]

[REDACTED]

[REDACTED] It will also negatively impact my standing in my community—where I and my family interact with others on a daily basis.

11. I request that the Court take into consideration the differences in the various social and governmental structures and ideologies in play in these cases. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. Ultimately, the disclosure of personally identifiable information could harm me, and other non-US customers like myself, in every aspect of life—not simply financially.

13. Given all of this, it is imperative that cryptocurrency holders' personally identifiable information be kept under seal and that, to the extent that it must be disclosed, it be made available only to those approved by the Court and pursuant to adequate security measures.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2023, at [REDACTED]

[REDACTED]
[REDACTED] _____